

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

Plaintiffs,

-v.-

JOSHUA MAST, *et al.*,

Defendants,

CIVIL NO: 3:22-cv-00049-NKM-JCH

**DEFENDANT RICHARD MAST'S MOTION TO SEAL EXHIBIT 2 TO DEFENDANT
RICHARD MAST'S MOTION TO QUASH/MODIFY SUBPOENA AND MOTION FOR
PROTECTIVE ORDER**

Defendant Richard Mast hereby moves for an order to seal Exhibit 2 to his motion to quash/modify subpoena and motion for protective order (Dkt. No. 345) pursuant to Local Civil Rule 9 and this Court's Protective Order (ECF No. 26).

In support of this motion to seal, Defendant Richard Mast states as follows: This Court has issued a Protective Order (ECF No. 26) allowing Plaintiffs to proceed under pseudonyms and requiring the parties to use pseudonyms. Exhibit 2 is Defendant Mast's privilege log that includes the identifying names and should be filed under seal. Accordingly, Defendant Mast requests that the Court order the sealing of Exhibits 2, provided to the Court by email..

A proposed Order is attached as Exhibit A to this Motion.

Dated: February 25, 2024

Respectfully submitted,

/s/*David Yerushalmi*
David Yerushalmi, Esq.*
American Freedom Law Center

2020 Pennsylvania Avenue NW, Suite 189
Washington, D.C. 20006
(*Admitted *pro hac vice*)

E. Scott Lloyd
Lloyd Law Group, PLLC
Va. Bar # 76989
20 E. 8th Street, Suite 3
Front Royal, VA 22630
Office: (540) 823-1110
Cell: (540) 631-4081
Fax: (540) 583-4279
scott@lloydlg.com

Counsel for Defendant Richard Mast

CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. I further certify that a copy of the foregoing has been served by ordinary U.S. mail upon all parties for whom counsel has not yet entered an appearance electronically: none.

*/s/*David Yerushalmi
David Yerushalmi, Esq.